

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, CAELAN DOHERTY, MAX GOLDSTEIN, BRIDGET LOGAN, JAMES KYLE NEWMAN, ZIA ORAM, ALAN ROBINSON, ALEXANDRA MARIE WHEATLEY-DIAZ, individually and on behalf all others similarly situated, and CHERYL BALDWIN, JONATHAN BARRIO, DESMOND BATTS, GARRETT BECKENBAUGH, COCHIESE BOWERS, MILES CEPLECHA, ROBIN CEPPOS, MELINDA CIRILO, JANE CONRAD, ROBERT CORDOVA, JR., CHRISTINE DOCZY, RACHEL DOUGLAS, THERESA EDWARDS, ELIZA FINK, JASON FINKELSTEIN, ILSE MENDEZ FRAGA, JOSH FREDRICKSON, MARIA GONZALEZ, NATHANIEL ROBERT GROH, BRANDI HARRIS, PETER KAMARA, MACK KENNEDY, MADISON OLIVER MAYS, PATRICK MCHUGH, FRIDA MICHELLE NARANJO, PAUL MONTEROSSO, REY MURPHY, JOSEPH NESTOR, LUKE NICHOLAS, JOSEPHINE OLINGER, ALEC SILVESTER, DANIEL SMITH, CHRIS SOTH, AUDRA TELLEZ, CARLOS TORRES, ELLIOTT TRICOTTI, GLORIA TYLER, LAKISHA WATSON-MOORE, JESSE WEINBERG, CLEM WRIGHT, ANOOSH YARAGHCHIAN, and JESUS ZAMORA, individually,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20 Civ. 2489 (LTS) (GWG)

**PLAINTIFFS'
MOTION FOR LEAVE TO FILE
THIRD AMENDED
COMPLAINT**

For the reasons set forth in Plaintiffs' accompanying Memorandum of Law, Plaintiffs respectfully request that the Court grant Plaintiffs leave to file a Third Amended Complaint pursuant to Fed. R. Civ. P. 15 and 21. Pursuant to the Court's Individual Practices, Plaintiffs certify that they have used their best efforts to informally resolve this request. Plaintiffs' counsel conferred with counsel for Defendant by email in May 2021 and again in May 2021 regarding Defendant's position on Plaintiffs' Motion. Defendant's counsel represented that Defendant opposes the relief requested.

Dated: May 31, 2022
New York, NY

Respectfully submitted,

/s/ Justin M. Swartz

Justin M. Swartz
Michael C. Danna
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: 212-245-1000
Facsimile: 646-509-2060
jms@outtengolden.com
mdanna@outtengolden.com

Hannah Cole-Chu*
OUTTEN & GOLDEN LLP
601 Massachusetts Avenue NW, Ste 200W
Washington, D.C. 20001
Telephone: 202-847-4400
Facsimile: 202-847-4410
hcolechu@outtengolden.com

Michael Palitz
SHAVITZ LAW GROUP, P.A.
800 3rd Avenue, Suite 2800
New York, NY 10022
Telephone: (800) 616-4000
Facsimile: (561) 447-8831
mpalitz@shavitzlaw.com
Gregg I. Shavitz*
Tamra Givens*
Logan Pardell*

SHAVITZ LAW GROUP, P.A.

951 Yamato Road, Suite 285

Boca Raton, FL 33431

Telephone: (561) 447-8888

Facsimile: (561) 447-8831

gshavitz@shavitzlaw.com

tgivens@shavitzlaw.com

lpardell@shavitzlaw.com

*Attorneys for Plaintiffs, the Collective, and the
Putative Classes*

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I, Justin Swartz, hereby certify that on May 31, 2022, I caused the forgoing to be electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent electronically to all registered parties by operation of the Court's electronic filing system.

Dated: May 31, 2022

/s/ Justin M. Swartz
Justin M. Swartz
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060